

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JANE DOE 1 and JANE DOE 2, on behalf of  
themselves and all similarly situated women,

Plaintiffs,

-against-

THE CITY OF NEW YORK and BENNY  
SANTIAGO,

Defendants.

15 Civ. 3849 (AKH)

**NOTICE OF PLAINTIFFS' MOTION TO COMPEL THE CITY TO PRODUCE  
DOCUMENTS**

PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of Plaintiffs' Motion to Compel the City to Produce Documents, and the Declaration of Josh E. Anderson, dated February 23, 2016 (the "Anderson Declaration"), and all attached exhibits, plaintiffs Jane Doe 1 and Jane Doe 2 ("Plaintiffs") will move this Court, at a date and time to be determined by the Court, pursuant to Federal Rule of Civil Procedure 37, for an order compelling the production of documents, and for such other relief as this Court deems just and proper; and

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1, unless the Court orders otherwise, opposition papers are due seven days after service of the moving papers, and reply papers two days after service of the opposition papers.

Plaintiffs submit the following exhibits to the Anderson Declaration:

Ex. 1	Plaintiffs' First Set of Requests for Production of Documents to Defendant the City of New York Relating to Merits Discovery, <i>Jane Doe 1 v. City of New York</i> , No. 15 Civ. 3849 (AKH) (S.D.N.Y. July 13, 2015)
Ex. 2	Defendant's Responses and Objections to Plaintiffs' First Set of Document Requests, <i>Jane Doe 1 v. City of New York</i> , No. 15 Civ. 3849 (AKH) (S.D.N.Y. Sept. 15, 2015)
Ex. 3	Deposition Transcript of Sean Cussen, <i>Jane Doe 1 v. City of New York</i> , No. 15 Civ. 3849 (AKH) (S.D.N.Y. Dec. 23, 2015) (excerpt)
Ex. 4	Letter from Danielle Mindlin to Arthur Larkin and Kimberly Joyce (Jan. 16, 2016)
Ex. 5	Letter from Josh Anderson to Arthur Larkin and Kimberly Joyce (Jan. 22, 2016)
Ex. 6	Letter from Josh Anderson to Arthur Larkin and Kimberly Joyce (Feb. 12, 2016)

Dated: New York, New York  
February 23, 2016

CLEARY GOTTlieb STEEN & HAMILTON LLP

By: /s/ James L. Bromley  
James L. Bromley  
*jbromley@cgsh.com*

One Liberty Plaza  
New York, New York 10006  
Tel: (212) 225-2000  
Fax: (212) 225-3999

Of Counsel:  
Mitchell A. Lowenthal  
*mlowenthal@cgsh.com*  
Josh E. Anderson  
*jeanderson@cgsh.com*  
Danielle P. Mindlin  
*dmindlin@cgsh.com*

William D. Gibney  
*wdgibney@legal-aid.org*  
Marlen S. Bodden  
*mbodden@legal-aid.org*  
Barbara P. Hamilton  
*bphamilton@legal-aid.org*  
THE LEGAL AID SOCIETY  
199 Water Street, 6th Floor  
New York, New York 10038  
Tel: (212) 577-3300

*Attorneys for Plaintiffs*